

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS and VERIZON CORPORATE  
SERVICES GROUP INC.,

Defendants,

CIVIL ACTION NO. 2:23-cv-00352

**JURY TRIAL DEMANDED**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

T-MOBILE USA, INC., and SPRINT CORP.,

*Defendants.*

Civil Action No. 2:23-cv-00379-JRG-RSP

**JURY TRIAL DEMANDED**

**JOINT MOTION TO CONTINUE HEARINGS ON MOTION TO  
COMPEL ITSON DOCUMENTS**

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, “Verizon” or “Defendants”) and T-Mobile USA, Inc. and Sprint Corp (collectively, “T-Mobile”) (all together, the “Parties”) respectfully file this Joint Motion to Continue the Hearings on Verizon’s Motion to Compel ItsOn Documents (Dkt. No. 142) and on T-Mobile’s Motion to Compel ItsOn Documents (Dkt. No. 141) (together, the “Motions”).

The hearings are presently scheduled for Wednesday, March 12, 2025, at 9:00 AM before Magistrate Judge Roy S. Payne. The Parties have been conferring on the issues raised in Verizon's and T-Mobile's Motions and believe they may be able to substantially narrow or resolve the disputes through further discussions and exchange of information. They thus agree it would be in the interest of justice and judicial economy for the hearing date to be rescheduled and respectfully request that the Court continue the hearing date to allow the Parties to continue to meet and confer on their disputes to narrow or resolve them before the hearing.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion and continue the hearing on Verizon's and T-Mobile's Motions to Compel Its On Documents for approximately two weeks.

Dated: March 10, 2025

*/s/ Marc Fenster*

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*/s/ Josh Krevitt*

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*Headwater Research LLC*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that on March 10, 2025, counsel for the parties conferred to discuss the substance of this Motion pursuant to Local Rule CV-7(h). Counsel for the parties agreed on the substance of this Motion and further agreed to jointly file this Motion.

/s/ Josh Krevitt  
Josh Krevitt

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 10<sup>th</sup> day of March, 2025.

/s/ Josh Krevitt  
Josh Krevitt